

PARTIES

6. All previous paragraphs of this complaint are incorporated by reference.
7. Plaintiff is James E. Wright, Jr., an adult individual with a mailing address of 416 Tohickon Avenue, Quakertown, PA 18951.
8. Defendants are the following individuals and business entities.
 - a. Experian Information Solutions, Inc., a corporation with an address including but not limited to 475 Anton Blvd., Costa Mesa, CA, 92626.
 - b. Experian Information Solutions, Inc., a corporation with an address including but not limited to 5 Century Drive, Parsippany, NJ 07054.
 - c. The above reference Defendants “a.” and “b.” may be the same corporate entity with different business addresses.
 - d. Search America, Inc. a business entity with an address including but not limited to 6450 Wedgewood Road, Suite 100, Maple Grove, MN 55311.
 - e. X,Y,Z Corporations, business entities whose identities are not known to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such entities played a substantial role in the commission of the acts described in this complaint.

COUNT ONE:

**James E. Wright Jr. v. Experian Information Solutions, Inc. and Search America, Inc.
Violation of the FCRA / FACTA, 15 USC 1681 et. seq.
Failure to Provide Address and Telephone Number of Saint Luke's Hospital**

9. All previous paragraphs of this complaint are incorporated by reference.
10. At all times mentioned herein Plaintiff was a consumer as defined by 15 USC 1681.
11. At all times mentioned herein Plaintiff was a person as defined by 15 USC 1681a (c).
12. At all times mentioned herein Plaintiff was an individual as defined by 15 USC 1681a (c).
13. At all times mentioned in this Complaint, Defendant(s) maintained a "consumer report" on Plaintiff as defined by 15 USC 1681(a)(d) et. seq.
14. At all times mentioned in this Complaint, all of the Defendant(s) were a "consumer Reporting Agency" (CRA) as defined by 15 USC 1681a(f) et. seq.
15. In the alternative, if any of the named defendants is found not to be a CRA, then the remaining defendant(s) may still be found to be a CRA.
16. At all times mentioned in this Complaint, all of the Defendant(s) were a "person" as defined by 15 USC 1681a(f) et. seq.
17. At various dates and times depicted in the attached exhibits, Defendants Experian Information Solutions, Inc. and Search America, Inc. acted collectively, jointly and in concert to provide Plaintiff's consumer report to Saint Luke's Hospital.

18. At various dates and times depicted in the attached exhibits, Defendants Experian Information Solutions, Inc. and Search America, Inc. operated collectively under the brand name “Experian” to provide Plaintiff’s consumer report to Saint Luke’s Hospital.
19. According to 15 USC 1681g(a)(3), a CRA is required to disclose to the consumer the names of all persons or business entities that accessed the consumer’s report within the last 12 months of the date of the report.
20. 15 USC 1681g(a)(3) also requires a CRA to provide the telephone number and address for the persons or business entities that accessed the consumer’s report in the last 12 months, upon written request of the consumer to disclose such information.
21. Plaintiff sent numerous written requests to all of the above named Defendants for the address and telephone number for Saint Lukes Hospital. See attached exhibits.
22. Defendant(s) received Plaintiff’s written request(s) for the address and telephone number for Saint Luke’s Hospital. See attached exhibits.
23. Defendant(s) refused to disclose to Plaintiff the address and telephone number for Saint Luke’s Hospital.
24. By refusing to disclose to Plaintiff’s the address or telephone number for Saint Luke’s Hospital, Defendant(s) violated 15 USC 1681g(a)(3) of the FCRA.

COUNT TWO: James E. Wright Jr. v. Search America, Inc. and Experian Information Solutions, Inc.

**Violation of FCRA / FACTA, 15 USC 1681 et. seq.
Failure to Provide Plaintiff with a Copy of Plaintiff's Consumer Report**

25. All previous paragraphs of this complaint are incorporated by reference and made a part of this Complaint.

26. At all times mentioned herein Plaintiff was a consumer as defined by 15 USC 1681.

27. At all times mentioned herein Plaintiff was a person as defined by 15 USC 1681a (c).

28. At all times mentioned herein Plaintiff was an individual as defined by 15 USC 1681a (c).

29. At all times mentioned in this Complaint, Defendant Search America, Inc. maintained a "consumer report" on Plaintiff as defined by 15 USC 1681(a)(d) et. seq.

30. At all times mentioned in this Complaint, Defendant Search America, Inc. was acting as a "consumer Reporting Agency" (CRA) as defined by 15 USC 1681a(f) et. seq.

31. Within the applicable statute of limitations prior to the commencement of this action, Plaintiff contacted Defendant Search America, Inc. in writing and requested a copy of the information contained in Plaintiff's consumer report which was maintained by Defendant Search America, Inc. See Exhibits.

32. At the time that Plaintiff requested Plaintiff's consumer report from Defendant Search America, Inc. Plaintiff furnished proper proof of identity and proper proof of mailing address.
33. Defendant(s) refused to provide Plaintiff with a free annual copy of Plaintiff's consumer report from Search America, Inc. See Exhibits.
34. Defendant(s) did not have a valid or sufficient reason to refuse to send Plaintiff a copy of Plaintiff's consumer report.
35. Defendant(s) breached its / their duty under 15 USC 1681g et. seq. to provide Plaintiff with a copy of Plaintiff's consumer report.
36. It is believed and averred that at all times mentioned in this Count Two of Plaintiff's Complaint, Defendants Experian Information Solutions, Inc. and Search America acted collectively, jointly and in concert and operated under the band name "Experian."

LIABILITY AND DAMAGES

37. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.
38. Defendant(s) is liable for the acts committed by its agents under the doctrine of respondeat superior because Defendant's agents were acting within the scope of their employment with Defendant.
39. In the alternative, Defendant(s) is liable for the conduct of its agents / employees under the theory of joint and several liability because Defendant and its agents / employees were engaged in a joint venture and were acting jointly and in concert.
40. At all times mentioned in this Complaint Defendants Experian Information Solutions, Inc. and Defendant Search America, Inc. were acting collectively, jointly and in concert, and therefore they are jointly and severally liable for the misconduct described in this Complaint.
41. In the event that it is determined by this Honorable Court that said Defendants were not acting collectively, jointly or in concert, then the remaining Defendant(s) may be held liable on an individual basis.
42. Any mistake made by Defendant(s) would have included a mistake of law.

43. Any mistake made by Defendant(s) would not have been a reasonable or bona fide mistake.

44. Plaintiff believes and avers that Defendant(s)' conduct was willful for reasons including but not limited to the following.

- a. The number of requests for the address and telephone number for Saint Luke's Hospital made by Plaintiff which were ignored by Defendant(s).
- b. The manner in which Search America, Inc. flat out refused to send Plaintiff a copy of the information contained in Plaintiff's consumer report.
- c. The number of similarly situated consumers whose rights under 15 USC 1681g(a)(3) et. seq. were violated by Defendant(s) in a similar manner in which Plaintiff's rights were violated.
- d. It is believed and averred that Defendant(s)' act and omissions were caused by Defendant(s)' standard business practices, policies and procedures antithetical to Defendant(s) duties to provide telephone numbers pursuant to 15 USC 1692g(a)(3) et. seq.

45. Plaintiff believes and aver that Plaintiff is entitled to at least \$1.00 actual damages including but not limited to phone, fax, stationary, postage, etc.
46. Plaintiff believes and aver that Plaintiff is entitled to \$1,000.00 statutory damages from all Defendants pursuant to 15 USC 1681 et. seq. for Count One.
47. Plaintiff believes and aver that Plaintiff is entitled to \$1,000.00 statutory damages from all Defendants pursuant to 15 USC 1681 et. seq. for Count Two.
48. Because Defendant(s)' conduct was willful, Plaintiff requests punitive damages in an amount to be determined by this Honorable Court.
49. For purposes of a default judgment, Plaintiff believes and avers that the amount of such punitive damages should be no less than \$150,000.00.

ATTORNEY FEES

50. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.

51. Plaintiff is entitled to reasonable attorney fees pursuant to 15 USC 1681 et. seq.

52. It is believed and averred that such reasonable attorney fees amount to no less than \$2,450.00 at a reasonable rate of \$350.00 per hour, enumerated below.

- | | |
|---------------------------------------------------------------------------------------------------------------------|---|
| a. Consultations with client, review of file, preparing letters | 1 |
| b. Drafting, editing, review, filing of complaint, amended complaint and service of Complaint and related documents | 3 |
| c. Drafting and serving discovery on Defense Counsel | 1 |
| d. Follow up contact with Defense | 2 |

$$7 \times \$350 = \$2,450.00$$

53. Plaintiff's attorney fees continue to accrue as the case move forward.

54. The above stated attorney fees are for prosecuting this matter and reasonable follow up.

OTHER RELIEF

55. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.

56. Plaintiff requests a jury trial in this matter.

57. Plaintiff demands a jury trial in this matter.

58. Plaintiff demands fees for prosecuting this action.

59. Plaintiff demands costs for prosecuting this action.

60. Plaintiff seeks such other relief as this Honorable Court may deem just and proper.

Wherefore, Plaintiff demands judgment against Defendant(s) in the amount of no less than \$154,451.00 as enumerated below.

\$1.00 more or less actual damages against all Defendants.

\$1,000.00 statutory damages for Count One

\$1,000.00 statutory damages for Count Two

\$2,450.00 attorney fees against all Defendants

\$150,000.00 punitive damages from all Defendants

Plaintiff also demands fees and costs associated with prosecuting this action. Plaintiff seeks such additional relief as this Honorable Court deems just and proper.

Vicki Piontek 1-1-2014
Vicki Piontek, Esquire Date
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
877-737-8617
palaw@justice.com
Fax: 866-408-6735

James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951
(267) 371-9281

Search America
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311

Re: **James E. Wright, Jr.** SSN [REDACTED] **DOB 9/3/1965**

To Whom it May Concern:

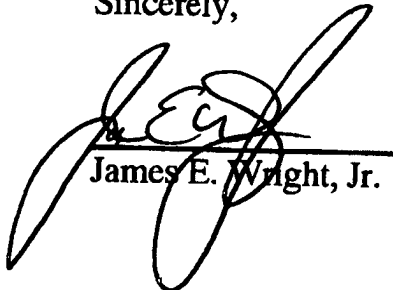
I am requesting copies of all personal information that your company has on me. Please produce copies of all consumer reports maintained on me by your company.

Please redact the first five digits of my Social Security Number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.

Enclosed please find a copy of my drivers license and other proof of my mailing address.

Thank you.

Sincerely,


James E. Wright, Jr.

7-12-13
Date

EXHIBIT A-1

DRIVER'S LICENSE

No: [REDACTED] Dupl: [REDACTED]

DOB: 09/03/1965 Sex: [REDACTED]

Class: C Eyes: [REDACTED]

Endorse: [REDACTED] Height: [REDACTED]

Com/Med Rstr: */*

Issued: 07/12/2011

Expires: 09/04/2015

Red

[REDACTED PHOTO]

JAMES E WRIGHT JR
416 TONCKON AVE
QUAKERTOWN PA 18951

Exhibit A-2

James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951
(267) 371-9281

Experian Healthcare
Attention: Compliance
6450 Wedgewood Road, Suite 100
Maple Grove, MN, 55311

Re: James E. Wright, Jr. SSN: [REDACTED] DOB 9/3/1965

To Whom it May Concern:

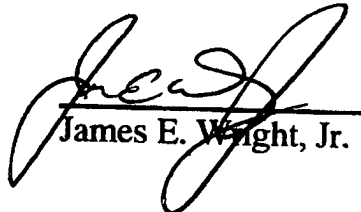
I am requesting copies of all personal information that your company has on me. Please produce copies of all consumer reports maintained on me by your company.

Please redact the first five digits of my Social Security Number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.

Enclosed please find a copy of my drivers license and other proof of my mailing address.

Thank you.

Sincerely,


James E. Wright, Jr.

7-12-13
Date

Exhibit

B- 1

DRIVER'S LICENSE

No. [REDACTED] **Duplicate** [REDACTED]

DOB: 09/03/1985 **Sex:** [REDACTED]

Class: C **Eyes:** [REDACTED]

Endorse: ----- **Height:** [REDACTED]

Com/Med Retr: */* **Issued:** 07/12/2011 **Expires:** 09/04/2015

for

JAMES E WRIGHT JR
416 TOMCKON AVE
QUAKERTOWN PA 18951

[REDACTED]

James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951
[REDACTED]

Experian Healthcare
Attention: Compliance
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311

Re: James E. Wright, Jr. SSN: [REDACTED] DOB 9/3/1965

To Whom it May Concern:

I am requesting copies of all personal information that your company has on me. Please produce copies of all consumer reports about me in the possession of your company.

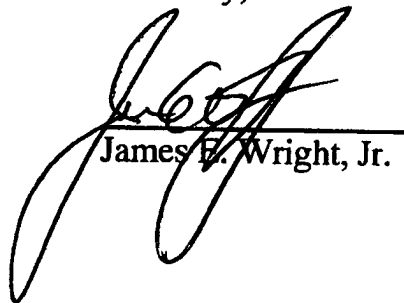
I would like the name, address and telephone number for every entity that accessed my consumer report in the last 12 months.

Please redact the first five digits of my Social Security Number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.

Enclosed please find a copy of my drivers license.

Thank you.

Sincerely,


James E. Wright, Jr.

7-29-13
Date

Exhibit C-1

DRIVER'S LICENSE

No. [REDACTED] Duplicate [REDACTED]

DOB: 09/03/1965 Sex: [REDACTED]

Class: C Eyes: [REDACTED]

Endorse: ---- Height: [REDACTED]

Com/Med Rstr: */*

Issued: 07/12/2011

Expires: 09/04/2015

fe

JAMES E WRIGHT JR
416 TOHICKON AVE
QUAKERTOWN PA 18951

[REDACTED]

[REDACTED]

Exhibit C-2



Experian Healthcare

6450 Wedgwood Road
Suite 100
Maple Grove, MN 55311
(1) 763 416 1000 T
(1) 763 416 1099 F
www.experian.com

August 1, 2013

James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951

Dear James:

Thank you for contacting Search America, Inc. (Experian Healthcare) about the information that you are questioning regarding information from your credit report. Let me start by letting you know that Experian Healthcare is not in the business of making inquiries for unlawful reasons. Our clients have a permissible purpose to access information regarding their patients under Section 604 of the Fair Credit Reporting Act. We provide a service for our customers to locate information through our systems to help verify demographic data and understand financial positions for their consumers.

Note that the inquiries through our systems are soft inquiries that do not affect your credit score and you are the only one who is able to view these inquiries. Other organizations looking at your credit report are not able to see these inquiries. Our main clientele is within the healthcare industry, so if you or any of your dependents have been to a medical facility that utilizes our tools, this could be how this inquiry has appeared on your credit report.

If you would like more information or would like to talk to someone in our Customer Care team, please contact our Consumer Line at 763.416.1030. We can assist you with the use of our services; however if you have specific questions about the inquiries that are not associated with Experian Healthcare, we will need you to contact the Experian National Consumer Assistance Center directly at 888-397-3742.

If you would like to speak with me, you can reach me directly at 763.416.1010.

Sincerely,

A handwritten signature in black ink that reads "Susan M. Hanson".

Susan M. Hanson
Compliance Officer
Experian Healthcare
susan.hanson@experian.com
(1) 763 416 1010 T

Exhibit D

James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951
[REDACTED]

Search America
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311

Re: James E. Wright, Jr. SSN: [REDACTED] DOB 9/3/1965

To Whom it May Concern:

I am requesting copies of all personal information that your company has on me. Please produce copies of all consumer reports about me in the possession of your company.

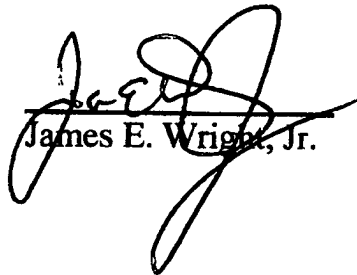
I would like the name, address and telephone number for every entity that accessed my consumer report in the last 12 months.

Please redact the first five digits of my Social Security Number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.

Enclosed please find a copy of my drivers license.

Thank you.

Sincerely,


James E. Wright, Jr.

8-5-13
Date

Exhibit

E-1

DRIVER'S LICENSE

No: [REDACTED] Dupl: [REDACTED]

DOB: 09/03/1965 Sex: [REDACTED]

Class: C Eyes: [REDACTED]

Endorse: --- Height: [REDACTED]

Com/Med Rstr: */*


Issued: 07/12/2011

Expires: 09/04/2015

for

JAMES E WRIGHT JR
416 TOHICKON AVE
QUAKERTOWN PA 18951



James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951


Search America
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311

Re: James E. Wright, Jr. SSN:  DOB 9/3/1965

To Whom it May Concern:

I am requesting copies of all personal information that your company has on me. Please produce copies of all consumer reports about me in the possession of your company.

I would like the name, address and telephone number for every entity that accessed my consumer report in the last 12 months.

I noticed from my Experian consumer report that your company accessed my information numerous times for Saint Lukes Quakertown and Saint Luke's Hospital in 2012 and in 2013. See excerpt from my Experian consumer report showing the inquiries from Saint Lukes Quakertown and Saint Lukes Hospital.

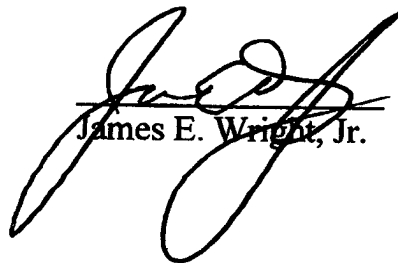
I would like the address and telephone number for Saint Lukes Quakertown and Saint Luke's Hospital.

Please redact the first five digits of my Social Security Number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.

Enclosed please find a copy of my drivers license.

Thank you.

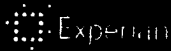
Sincerely,


James E. Wright, Jr.

8-19-13
Date

Exhibit

F-1



Prepared for: JAMES E WRIGHT Jr
Date: April 18, 2013
Report number: 2093-3884-11

Page 14 of 18

Record of requests for your credit history

We make your credit history available to your current and prospective creditors and employers as allowed by law. Experian may list these inquiries for up to two years.

Inquiries shared with others

The section below lists all of the companies that have requested your credit information as a result of an action you took, such as applying for credit or financing or as a result of a collection. The inquiries in this section are shared with companies that receive your credit history.

Examples of inquiries shared with others include:

- a real estate loan
- a home mortgage loan
- an auto loan
- an application for credit

MRS BPO
1930 OLNEY AVE
CHERRY HILL NJ 08003
No phone number available
Address identification number:
0039164528

Date
Jun 28, 2011
Reason
Unspecified. This inquiry is scheduled to
continue on record until Jul 2013.

Inquiries shared only with you

You may not have initiated the following inquiries, so you may not recognize each source. We report these requests to you only as a record of activities, and we do not include any of these requests on credit reports to others.

We offer credit information about you to those with a permissible purpose, such as:

- other creditors who want to offer you preapproved credit;
- an employer who wishes to extend an offer of employment;
- a potential investor in assessing the risk of a current obligation;
- Experian Consumer Assistance to process a report for you;
- your current creditors to monitor your accounts (date listed may reflect only the most recent request).

These inquiries DO NOT affect your credit score.

SEARCH AMERICA 6450 WEDGWOOD RD N STE 100 MAPLE GROVE MN 55311
No phone number available
On behalf of SLHHN ST LUKES QUAKERTOW for 30
Date of inquiry: Mar 09, 2013

SEARCH AMERICA

No phone number available
On behalf of SLHHN ST LUKES HOSPITAL for 30
Date of inquiry: Feb 25, 2013; Dec 10, 2012

CHASE BANK USA,NA PO BOX 24896 COLUMBUS OH 43224
(800) 848 9136
Date of inquiry: Jan 09, 2013

PCS OUTSOURCING GROUP 900 CORPORATE DR READING PA 19605
(810) 916 7284
Date of inquiry: Nov 23, 2012

SEARCH AMERICA 6450 WEDGWOOD RD N STE 100 MAPLE GROVE MN 55311

No phone number available
On behalf of SLHHN ST LUKES HOSPITAL for 30
Date of inquiry: Sep 28, 2012

EXPERIAN PO BOX 9600 ALLEN TX 75013
No phone number available
Date of inquiry: Jun 05, 2012; Sep 06, 2010; Sep 06, 2010; Jan 02, 2007

EXPERIAN 380 E 22ND ST LOMBARD IL 60148
No phone number available
Date of inquiry: May 14, 2012

TARGET NATIONAL BANK PO BOX 673 MINNEAPOLIS MN 55440
(888) 755 5856
Date of inquiry: May 14, 2012

KOHL'S PO BOX 3115 MILWAUKEE WI 53201
(262) 703 7000
Date of inquiry: May 11, 2012

LEXISNEXIS/INS/P&C 1000 ALDERMAN DR ALPHARETTA GA 30005
No phone number available
On behalf of ERIE INSURANCE GROU AGEN for insurance underwriting
Date of inquiry: Mar 19, 2012

EXPERIAN PO BOX 2002 ALLEN TX 75013
No phone number available
Date of inquiry: Jan 13, 2012

HSBC NV CARD SERVICES PO BOX 30253 SALT LAKE CITY UT 84130
No phone number available
Date of inquiry: Dec 27, 2011; Nov 18, 2011; Nov 03, 2011; Sep 23, 2011

0158888971

7094-02-00-001-3884-007-4010944

Exhibit F-2

DRIVER'S LICENSE



No: [REDACTED] Dups: 00

DOB: 09/03/1965 Sex: M

Class: C Eyes: BLU

Endorse: ----- Height: 5'10"

Com/Med Rstr: */*

Issued: 07/12/2011

Expires: 09/04/2015

James E Wright Jr

**JAMES E WRIGHT JR
416 TORRICKON AVE
QUAKERTOWN PA 18951**



Exhibit F-3

James Wright
416 Tohickon Avenue
Quakertown, PA 18951

Experian
P.O. Box 2002
Allen, TX 75013

Re: James E. Wright, Jr. SSN [REDACTED] DOB 9-3-1965
Inquiries Made by Search America / Experian Healthcare

To Whom it May Concern:

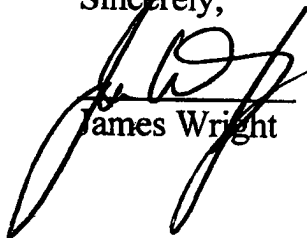
Enclosed please find an excerpt from my recent consumer report showing inquiries on my Experian consumer report. Search America / Experian Healthcare has made numerous inquiries on my Experian consumer report in 2012 and 2013.

The inquiries were apparently made on behalf of Saint Lukes Quakertown and Saint Lukes Hospital. I would like the address and telephone number for Saint Lukes Quakertown and Saint Lukes Hospital.

Enclosed please find a copy of my drivers license.

Thank you.


Sincerely,



James Wright

8-19-13
Date

Exhibit G-1



DRIVER'S LICENSE



No:  Dups: 00
DOB: 09/03/1965 Sex: M
Class: C Eyes: BLU
Endorse: ----- Height: 5'10"
Com/Med Rstr: */*
Issued: 07/12/2011
Expires: 09/04/2015

J. E. Wright Jr.

JAMES E WRIGHT JR
416 TOHICKON AVE
QUAKERTOWN PA 18951

Exhibit

G-2

U.S. POSTAL SERVICE **CERTIFICATE OF MAIL**
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT
PROVIDE FOR INSURANCE—POSTMASTER

Received From
James E. Wright, Jr.
416 Tohickon Ave
Quakertown, PA 18951

One piece of ordinary mail addressed to:
Experian
P.O. Box 2002
Allen, TX 75013

1000

U.S. POSTAGE
PAID
LANSDALE, PA
AUG 19 13
\$1.20
0003,614-09
UNIT
AMOUNT

U.S. POSTAL SERVICE

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Exhibit G-3

James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951
[REDACTED]

Experian Healthcare
Attention: Compliance
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311

Re: James E. Wright, Jr. SSN [REDACTED] DOB 9/3/1965

To Whom it May Concern:

I am requesting copies of all personal information that your company has on me. Please produce copies of all consumer reports about me in the possession of your company.

I would like the name, address and telephone number for every entity that accessed my consumer report in the last 12 months.

I noticed from my Experian consumer report that your company accessed my information numerous times for Saint Lukes Quakertown and Saint Luke's Hospital in 2012 and in 2013. See excerpt from my Experian consumer report showing the inquiries from Saint Lukes Quakertown and Saint Lukes Hospital.

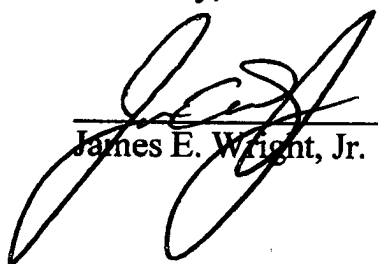
I would like the address and telephone number for Saint Lukes Quakertown and Saint Luke's Hospital.

Please redact the first five digits of my Social Security Number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.

Enclosed please find a copy of my drivers license.

Thank you.

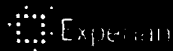
Sincerely,


James E. Wright, Jr.

8-19-13
Date

Exhibit

H-1



Prepared for: JAMES E WRIGHT Jr
Date: April 18, 2013
Report number: 2093-3684-11

Page 14 of 18

Record of requests for your credit history

We make your credit history available to your current and prospective creditors and employers as allowed by law. Experian may list these inquiries for up to two years.

Inquiries shared with others

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Examples of inquiries shared with others include:

- a real estate loan
- a home mortgage loan
- an auto loan
- an application for credit

MRS BPO
1930 OLNEY AVE
CHERRY HILL NJ 08003
No phone number available
Address identification number:
0039164528

Date
Jun 28, 2011
Reason
Unspecified. This inquiry is scheduled to
continue on record until Jul 2013.

Inquiries shared only with you

You may not have initiated the following inquiries, so you may not recognize each source. We report these requests to you only as a record of activities, and we do not include any of these requests on credit reports to others.

We offer credit information about you to those with a permissible purpose, such as:

- other creditors who want to offer you preapproved credit;
- an employer who wishes to extend an offer of employment;
- a potential investor in assessing the risk of a current obligation;
- Experian Consumer Assistance to process a report for you;
- your current creditors to monitor your accounts (date listed may reflect only the most recent request).

These inquiries **DO NOT** affect your credit score.

SEARCH AMERICA 6450 WEDGWOOD RD N STE 100 MAPLE GROVE MN 55311
No phone number available
On behalf of SLHHN ST LUKES QUAKERTOW for 30
Date of Inquiry: Mar 09, 2013

SEARCH AMERICA

No phone number available

On behalf of SLHHN ST LUKES HOSPITAL for 30

Date of Inquiry: Feb 25, 2013; Dec 10, 2012

CHASE BANK USA,NA PO BOX 24896 COLUMBUS OH 43224
(800) 848 9136

Date of inquiry: Jan 09, 2013

PCS OUTSOURCING GROUP 900 CORPORATE DR READING PA 19605
(810) 916 7284

Date of Inquiry: Nov 23, 2012

SEARCH AMERICA 6450 WEDGWOOD RD N STE 100 MAPLE GROVE MN 55311

No phone number available

On behalf of SLHHN ST LUKES HOSPITAL for 30

Date of Inquiry: Sep 26, 2012

EXPERIAN PO BOX 9600 ALLEN TX 75013

No phone number available

Date of inquiry: Jun 05, 2012; Sep 08, 2010; Sep 06, 2010; Jan 02, 2007

EXPERIAN 360 E 22ND ST LOMBARD IL 60148

No phone number available

Date of Inquiry: May 14, 2012

TARGET NATIONAL BANK PO BOX 873 MINNEAPOLIS MN 55440
(888) 755 5858

Date of Inquiry: May 14, 2012

KOHL'S PO BOX 3115 MILWAUKEE WI 53201
(262) 703 7000

Date of Inquiry: May 11, 2012

LEXISNEXIS/INS/P&C 1000 ALDERMAN DR ALPHARETTA GA 30005

No phone number available

On behalf of ERIE INSURANCE GROU AGEN for Insurance underwriting

Date of Inquiry: Mar 19, 2012

EXPERIAN PO BOX 2002 ALLEN TX 75013

No phone number available

Date of Inquiry: Jan 13, 2012

HSBC NV CARD SERVICES PO BOX 30253 SALT LAKE CITY UT 84130

No phone number available

Date of Inquiry: Dec 27, 2011; Nov 18, 2011; Nov 03, 2011; Sep 23, 2011

0158888971

7094-02-01-0001 1/09-0107 01/09/14

Exhibit


H-2


DRIVER'S LICENSE

No. [REDACTED] **Dups:** 00
DOB: 09/03/1965 **Sex:** M
Class: C **Eyes:** BLU
Endorse: ---- **Height:** 5'10"
Com/Med Restr: */*
Issued: 07/12/2011
Expires: 09/04/2015

J. E. Wright Jr.

JAMES E WRIGHT JR
416 TOMICKON AVE
QUAKERTOWN PA 18951





Exhibit

H-3

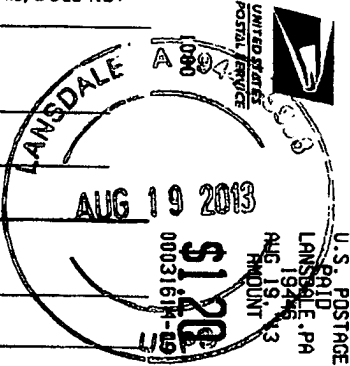
U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER			
Received From:			
James E. Wright, Jr.			
416 Tohickon Ave Quakertown, PA 18951			
One piece of ordinary mail addressed to.			
Experian Healthcare			
Attention: Compliance			
6450 Wedgewood Road, Suite 100			
Maple Grove, MN 55311			

Exhibit H-4



Prepared for: JAMES E WRIGHT JR
Date: August 29, 2013
Report number: 3578-2680-76

Page 1 of 16

Exhibit I

Dear JAMES E WRIGHT JR,

To assist you in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit report.

OTHER ITEMS DISPUTED ARE NOT CURRENTLY DISPLAYING ON YOUR PERSONAL CREDIT REPORT.



Scan me with your smart phone
for special offers from Experian.

By federal law, your personal credit report must list all organizations that have requested your credit history. In accordance with the Fair Credit Reporting Act, entities who have certified to Experian that they have a permissible purpose may inquire about credit information. For example, organizations that have granted you credit or with whom you have applied for credit, or entities collecting on transactions that you initiated or on judgments rendered against you, are permitted to make inquiries on your credit report. Requests for your credit history remain on the personal credit report for at least two years.

Inquiries from credit grantors who request your credit information as part of your application for credit will display under the heading "Inquiries shared with others" on your personal credit report. These inquiries display on your credit report when it is accessed by others with a permissible purpose. These inquiries may affect your credit score.

Other inquiries for your credit information are considered "soft" inquiries and do not affect your credit score. Some examples are: your current creditors to monitor your accounts; other creditors who want to offer you preapproved credit; an employer who wishes to extend an offer of employment; and a potential investor assessing the risk of a current credit obligation. These inquiries appear under the heading "Inquiries shared only with you" on your personal credit report. You will not receive this explanation again if you dispute this same item within the next 30 days.

Sincerely,

Experian
NCAC
PO BOX 9701
Allen TX 75013

0158888971

PO Box 9701
Allen, TX 75013



0033065 03 MB 0.652 "AUTO 0 07208 18951-134316 -C02-P03088-1
JAMES E WRIGHT Jr
416 TOHICKON AVENUE
QUAKERTOWN PA 18951-1343



Scan me with your smart phone
for special offers from Experian.

0156888971



Prepared for: JAMES E WRIGHT Jr
Date: August 29, 2013
Report number: 3578-2680-76

Page 1 of 2

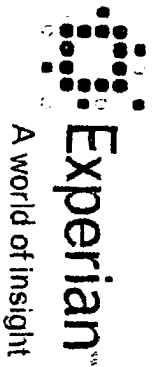
Dear JAMES E WRIGHT Jr

If you question the results of our dispute process, then you may want to contact the furnisher of information directly or review the original information in the public record. Please refer to your original personal credit report for the furnisher or public records office name, address, and phone number (if available).

Sincerely,

Experian
NCAC
PO BOX 9701
Allen TX 75013

Exhibit J



Prepared for: JAMES E WRIGHT JR
 Date: October 01, 2013
 Report number: 4251-2639-50

Page 1 of 16

Dear JAMES E WRIGHT JR,

To assist you in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit report.

By federal law, your personal credit report must list all organizations that have requested your credit history. In accordance with the Fair Credit Reporting Act, entities who have certified to Experian that they have a permissible purpose

may inquire about credit information. For example, organizations that have granted you credit or with whom you have applied for credit, or entities collecting on transactions that you initiated or on judgments rendered against you, are permitted to make inquiries on your credit report. Requests for your credit history remain on the personal credit report for at least two years.

Inquiries from credit grantors who request your credit information as part of your application for credit will display under the heading "Inquiries shared with others" on your personal credit report. These inquiries display on your credit report when it is accessed by others with a permissible purpose. These inquiries may affect your credit score.

Other inquiries for your credit information are considered "soft" inquiries and do not affect your credit score. Some examples are: your current creditors to monitor your accounts; other creditors who want to offer you preapproved credit; an employer who wishes to extend an offer of employment; and a potential investor assessing the risk of a current credit obligation. These inquiries appear under the heading "Inquiries shared only with you" on your personal credit report. You will not receive this explanation again if you dispute this same item within the next 30 days.

If you question the results of our dispute process, then you may want to contact the furnisher of information directly or review the original information in the public record. Please refer to your original personal credit report for the furnisher or public records office name, address, and phone number (if available).

Sincerely,

Experian
 NCAC
 PO BOX 9701
 Allen TX 75013

Scan me with your smart phone
 for special offers from Experian.



0003469 02 MB 0.402 **AUTO 2 0 7235 18951-134316 -C02-P03472-1
 JAMES E WRIGHT Jr
 416 TOHICKON AVENUE
 QUAKERTOWN PA 18951-1343



0158888971

Exhibit K

James Wright
416 Tohickon Avenue
Quakertown, PA 18951
267-373-9736

Experian
P.O. Box 2002
Allen, TX 75013

Experian Healthcare / Search America
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311

Re: James E. Wright, Jr. SSN 157-68-4036 DOB 9-3-1965
Inquiries Made by Search America / Experian Healthcare

To Whom it May Concern:

I would like answers.

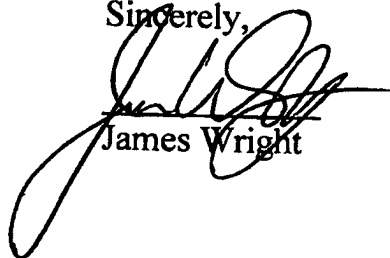
Enclosed please find an excerpt from my recent consumer report showing an inquiry on my Experian consumer report by Experian Health / Search America in February, 2013.

This inquiry was apparently made on behalf of Saint Saint Lukes Hospital. I would like the address and telephone number for Saint Lukes Hospital.

Enclosed please find a copy of my drivers license to prove my identity.

Thank you.

Sincerely,


James Wright

11-14-13
Date

Exhibit L-1



Prepared for: JAMES E WRIGHT Jr
 Date: April 18, 2013
 Report number: 2093-3684-11

Page 14 of 18

Record of requests for your credit history

We make your credit history available to your current and prospective creditors and employers as allowed by law. Experian may list these inquiries for up to two years.

Inquiries shared with others

The section below lists all of the companies that have requested your credit information as a result of an action you took, such as applying for credit or financing or as a result of a collection. The inquiries in this section are shared with companies that receive your credit history.

Examples of inquiries shared with others include:

- a real estate loan
- a home mortgage loan
- an auto loan
- an application for credit

MRS BPO
 1930 OLNEY AVE
 CHERRY HILL NJ 08003
 No phone number available
 Address identification number:
 0039164528

Date
 Jun 26, 2011
 Reason
 Unspecified. This inquiry is scheduled to
 continue on record until Jul 2013.

Inquiries shared only with you

You may not have initiated the following inquiries, so you may not recognize each source. We report these requests to you only as a record of activities, and we do not include any of these requests on credit reports to others.

We offer credit information about you to those with a permissible purpose, such as:

- other creditors who want to offer you preapproved credit;
- an employer who wishes to extend an offer of employment;
- a potential investor in assessing the risk of a current obligation;
- Experian Consumer Assistance to process a report for you;
- your current creditors to monitor your accounts (date listed may reflect only the most recent request).

These inquiries DO NOT affect your credit score.

SEARCH AMERICA 8450 WEDGWOOD RD N STE 100 MAPLE GROVE MN 55311
 No phone number available
 On behalf of SLHHN ST LUKES QUAKERTOW for 30
 Date of inquiry: Mar 09, 2013

SEARCH AMERICA

No phone number available

On behalf of SLHHN ST LUKES HOSPITAL for 30

Date of inquiry: Feb 28, 2013; Dec 10, 2012

CHASE BANK USA, NA PO BOX 24696 COLUMBUS OH 43224
 (800) 848 9136

Date of inquiry: Jan 09, 2013

PCS OUTSOURCING GROUP 800 CORPORATE DR READING PA 19605
 (610) 918 7284

Date of inquiry: Nov 23, 2012

SEARCH AMERICA 8450 WEDGWOOD RD N STE 100 MAPLE GROVE MN 55311

No phone number available

On behalf of SLHHN ST LUKES HOSPITAL for 30

Date of inquiry: Sep 28, 2012

EXPERIAN PO BOX 8800 ALLEN TX 75013

No phone number available

Date of inquiry: Jun 05, 2012; Sep 08, 2010; Sep 06, 2010; Jan 02, 2007

EXPERIAN 380 E 22ND ST LOMBARD IL 60148

No phone number available

Date of inquiry: May 14, 2012

TARGET NATIONAL BANK PO BOX 873 MINNEAPOLIS MN 55440
 (888) 755 5856

Date of inquiry: May 14, 2012

KOHL'S PO BOX 3115 MILWAUKEE WI 53201
 (262) 703 7000

Date of inquiry: May 11, 2012

LEXISNEXIS/INS/P&C 1000 ALDERMAN DR ALPHARETTA GA 30005

No phone number available

On behalf of ERIE INSURANCE GROU AGEN for Insurance underwriting

Date of inquiry: Mar 19, 2012

EXPERIAN PO BOX 2002 ALLEN TX 75013

No phone number available

Date of inquiry: Jan 13, 2012

HSBC NV CARD SERVICES PO BOX 30253 SALT LAKE CITY UT 84130

No phone number available

Date of inquiry: Dec 27, 2011; Nov 18, 2011; Nov 03, 2011; Sep 23, 2011

0158888971

709-02-04000-310-0001-00010000

Exhibit L-2

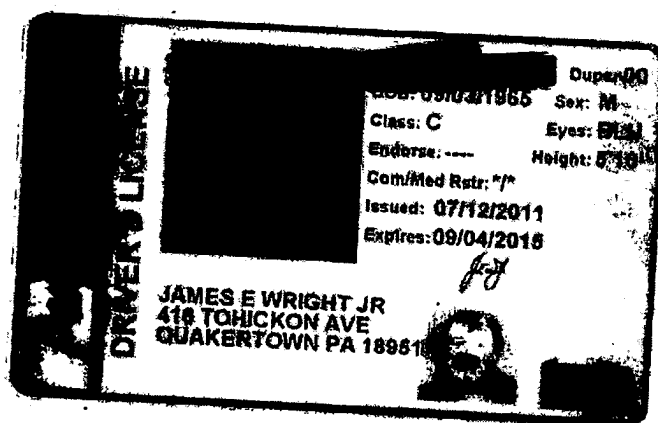


Exhibit L-3

James Wright
416 Tohickon Avenue
Quakertown, PA 18951
267- [REDACTED]

Experian
P.O. Box 2002
Allen, TX 75013

Experian Healthcare / Search America
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311

Re: James E. Wright, Jr. SSN [REDACTED] D. [REDACTED]
Inquiries Made by Search America / Experian Healthcare

To Whom it May Concern:

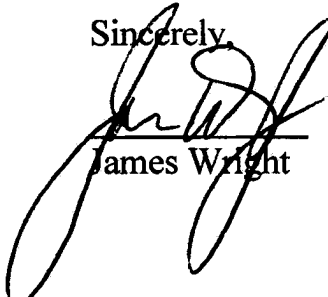
I would like answers.

Enclosed please find an excerpt from my recent consumer report showing an inquiry on my Experian consumer report by Experian Health / Search America in February, 2013.

This inquiry was apparently made on behalf of Saint Saint Lukes Hospital. I would like the address and telephone number for Saint Lukes Hospital.

Enclosed please find a copy of my drivers license to prove my identity.

Thank you.

Sincerely,

James Wright

1/20/13
Date

Exhibit M-1



Prepared for: **JAMES E WRIGHT JR**
 Date: **November 25, 2013**
 Report number: **3314-7169-92**

Page 1 of 16

Dear JAMES E WRIGHT JR,

To assist you in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit report.

By federal law, your personal credit report must list all organizations that have requested your credit history. In accordance with the Fair Credit Reporting Act, entities who have certified to Experian that they have a permissible purpose

may inquire about credit information. For example, organizations that have granted you credit or with whom you have applied for credit, or entities collecting on transactions that you initiated or on judgments rendered against you, are permitted to make inquiries on your credit report. Requests for your credit history remain on the personal credit report for at least two years.

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Sincerely,

Experian
 NCAC
 PO BOX 9701
 Allen TX 75013

Scan me with your smart phone
 for special offers from Experian.



PO Box 9701
 Allen, TX 75013



0002414 02 MB 0.402 **AUTO 507283 18951-134318 -C02-P02416-4

JAMES E WRIGHT Jr
 416 TOHICKON AVENUE
 QUAKERTOWN PA 18951-1343



0158888971

Exhibit N

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

James E. Wright, Jr.
416 Tohickon Avenue
Quakertown, PA 18951,

Plaintiff

v.
Experian Information Solutions, Inc.
475 Anton Blvd.
Costa Mesa, CA, 92626
and

Experian Information Solutions, Inc.,
5 Century Drive
Parispany, NJ 07054,
and

Search America, Inc.
6450 Wedgewood Road, Suite 100
Maple Grove, MN 55311
and
X,Y,Z Corporations,

Defendant(s)

13-cv-07649

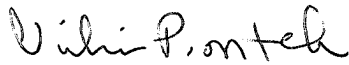
Jury Trial Demanded

CERTIFICATE OF SERVICE

I, Vicki Piontek, Esquire affirm that I served a true and correct copy of the attached AMENDED COMPLAINT on the following parties at the following addresses.

JONES DAY
DAVID M. BELCZYK, ESQUIRE
500 GRANT STREET, SUITE 4500
PITTSBURGH, PA 15219

KAPLIN STEWART MELOFF REITER & STEIN PC
MOHAMMAD A. GHASUDDIN, ESQUIRE
910 HARVEST DRIVE
P.O BOX 3037
BLUE BELL, PA 19422-0765



Vicki Piontek, Esquire
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
877-737-8617
palaw@justice.com
Fax: 866-408-6735

1-1-2014
Date